

20770-00141

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TERESA ALFEREZ	:	CIVIL ACTION
	:	
v.	:	NO. 02-2907
	:	
3M CORPORATION	:	

**DEFENDANT, 3M CORPORATION'S ANSWER
TO PLAINTIFF'S COMPLAINT**

Defendant, 3M Corporation, by and through its attorneys, Marshall, Dennehey, Warner, Coleman and Goggin, herewith files this Answer to plaintiff's Complaint:

FIRST DEFENSE

The allegations contained in paragraph 1, 5, 7, 8-13 are denied. Following a reasonable investigation, answering defendant is without knowledge or information sufficient to form a belief as to the truth of the averments contained in paragraphs 1, 5, 7-13 of plaintiff's Complaint and accordingly denies same and demands strict proof thereof if deemed material.

SECOND DEFENSE

The allegations contained in paragraph 2 of plaintiff's Complaint are specifically denied. Defendant, 3M Corporation is a corporation organized and existing under the laws of the State of

Minnesota. The remaining allegations contained in paragraph 2 of plaintiff's Complaint are admitted.

THIRD DEFENSE

The allegations contained in paragraphs 4 and 6 of plaintiff's Complaint are admitted.

FOURTH DEFENSE

Plaintiff's Complaint fails to set forth the cause of action and/or claim for relief.

FIFTH DEFENSE

The superseding negligence of parties and/or entities over which this defendant had no control nor right to control relieves the answering defendant of any liability.

SIXTH DEFENSE

The claims of the plaintiff are barred by the applicable statute of limitations.

SEVENTH DEFENSE

Liability of this defendant, if any, is mitigated by the provisions of the Pennsylvania Comparative Negligence Statute.

EIGHTH DEFENSE

Plaintiff assumed the risk.

WHEREFORE, answering defendant demands judgment in its favor and against the plaintiff.

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

BRADLEY D. REMICK, ESQUIRE
Attorney for defendant, 3M Corporation